

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI**

JACALYN MOSS and STEPHANIE MOSS,

Plaintiffs,

v.

RAY COUNTY, MISSOURI,

Defendant

Case No. 4:25-cv-00298-FJG

JOINT MOTION FOR PROTECTIVE ORDER

COME NOW the parties, by and through their undersigned and respective attorneys of record, and pursuant to Federal Rule of Civil Procedure 26, move this Court for issuance of a Protective Order providing for discovery of confidential records and other sensitive information only on specified terms and conditions, and restricting use and dissemination of such records or information secured through formal or informal discovery in this case. As grounds for their Motion, the parties jointly state to the Court as follows:

1. This is a suit of a civil nature over which the District Courts of the United States have original jurisdiction pursuant to the provisions of 42 U.S.C. §1983 and 537.610 RSMO. Plaintiff alleges a claim for negligence under Missouri State law, and “deliberate indifference” in violation of 42 U.S.C. §1983.

2. The parties anticipate they will exchange information and take depositions concerning confidential reports and other documents and tangible things which would otherwise be considered confidential, privileged and/or sensitive.

3. The production of these documents and tangible things, and the taking of depositions, will be impaired and hindered by the lack of an appropriate Protective Order controlling the use, dissemination and disclosure of these materials and information.

4. Realizing that a Protective Order would be beneficial to the parties and the discovery process, the parties have conferred and reached an agreement with regard to an appropriate Protective Order concerning these documents and information. The parties' proposed Protective Order is attached hereto as **Exhibit A** and will be electronically submitted in Word format to the Court.

5. Pursuant to Federal Rule of Civil Procedure 26, this Court has the authority to issue the requested Protective Order.

WHEREFORE, based upon the above and foregoing, the parties jointly respectfully move this Court to enter a Protective Order in the form attached hereto, together with such other and further relief as this Court deems just and appropriate.

Respectfully submitted,

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